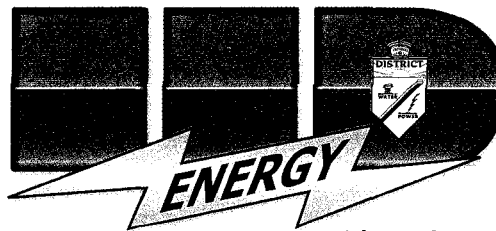


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*A division of
Imperial Irrigation District*

P.O. Box 937 • 333 E. Barioni Blvd. • Imperial, CA 92251 • www.iid.com

January 31, 2006

E-00000D-05-0040

Mr. Ernest Johnson
Director, Utilities Division
Arizona Corporation Commission
1210 West Washington Avenue
Phoenix, AZ 85007

FEB 03 2006

RE: Ten-Year Plan, Imperial Irrigation District

Dear Mr. Johnson:

The Imperial Irrigation District ("IID") is actively pursuing the potential of a minimum of 200MW of transmission capacity from the Palo Verde "hub" to the IID service territory, just west of the Colorado River. The IID total service area (covering Imperial County and portions of San Diego and Riverside counties in California) covers approximately 6471 square miles across south-eastern California. Although IID does not believe that is obligated to do so under A.R.S. §40-360.02, the attached transmission plans have been incorporated into the transmission capacity requirements for the 2006-2015 time period for the IID.

Please let me know if you have any questions or comments.

Sincerely,

Juan C. Sandoval
Assistant Manager,
System Planning and Engineering

Enclosures

Cc: G. Steiger
J. Federowicz
David L. Barajas
M. Etherton
C. Downey

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Imperial Irrigation District Ten-Year Plan 2006 – 2015

General Information

This report is submitted to the Arizona Corporation Commission (“ACC”) to provide information outlined in A.R.S. §40-360.02 relating to power plant and transmission line siting requirements.

This report contains projects that IID anticipates to participate as an owner to provide an additional 200MW (minimum) of capacity to access competitive markets at the Palo Verde “hub” to meet the IID load growth for this Ten-Year period. Please also reference the submittals of Southern California Edison and Arizona Public Service as we are reviewing the potential for either project (specific studies are being performed by each of these entities). IID is pursuing both of these projects; however, we anticipate that IID will ultimately participate in only one to meet our long term requirements. IID will update the ACC with the ultimate plans when they have been finalized.

IID has been an active member in the Southwest Transmission Expansion Plan (“STEP”) group, and the Southwest Area Transmission Plan (“SWAT”) and will continue to provide input on plans to meet the mutual objectives of the work groups. These regional planning efforts have provided a forum to share in potential ideas and potential projects to meet our individual transmission objectives.

**Imperial Irrigation District
Ten-Year Plan
Planned Transmission Facilities**

Line Designation	Palo Verde Hub to IID Service area, Northern (Reference SCE DPV2 Line Designation)
Project Description	
Voltage	500kV
Capacity	minimum 200MW (depending on the rating)
Origin	Harquahala Switchyard
Termination	Devers, Blythe, or new IID 500/230kV substation near Coachella Valley
Length	Approximately 120 - 240 Miles (depending on the termination location).
Routing	Along the existing Palo Verde – Devers 500kV line ROW, or a potential new ROW to be developed towards the Blythe area. .
Purpose	To provide access to competitive resources from the Palo Verde area generation to IID.
Schedule	
Construction Start	Proposed Fall 2008
In-Service	Proposed late 2010
Is Certificate Necessary	Yes, to be filed at a later date.

Imperial Irrigation District Ten-Year Plan Planned Transmission Facilities

Line Designation	Palo Verde Hub to IID Service area, Southern (Reference APS Palo Verde to Yuma Project)
Project Description	
Voltage	500kV or 230kV
Capacity	minimum 200MW (depending on the rating)
Origin	Palo Verde Switchyard or Vicinity
Termination	North Gila, Imperial Valley or new IID 500/230kV substation near existing geothermal facilities, approximately 30 miles west of Yuma.
Length	Approximately 115 miles. (to North Gila, IID may continue to the other terminations described above).
Routing	Along the existing Hassayampa – North Gila 500kV line ROW.
Purpose	To provide access to competitive resources from the Palo Verde area generation to IID. This Project is expected to be a joint participation project.
Schedule	
Construction Start	Proposed Fall 2008
In-Service	Proposed 2012, or sooner
Is Certificate Necessary	Yes, to be filed at a later date.